

**IN THE CHANCERY COURT FOR DAVIDSON COUNTY, TENNESSEE
TWENTIETH JUDICIAL DISTRICT AT NASHVILLE**

STATE OF TENNESSEE,)	
)	
Plaintiff,)	
)	
v.)	No. 04-727-IV
)	
)	
VINCENT GOULD, individually and doing)	
business as WE THE PEOPLE FORMS AND)	
SERVICE CENTER OF NASHVILLE;)	
SHANNON GOULD, individually and doing)	
business as WE THE PEOPLE FORMS AND)	
SERVICE CENTER OF NASHVILLE; WE)	
THE PEOPLE OF NASHVILLE, TN, INC.,)	
a Tennessee Corporation; KRISTIN MOTLEY,)	
individually and doing business as WE THE)	
PEOPLE FORMS AND SERVICE CENTER)	
OF KNOXVILLE; MOTLEY 4, LLC, a)	
Tennessee Limited Liability Company; WE)	
THE PEOPLE OF KNOXVILLE, TN, INC.,)	
a Tennessee Corporation; WE THE)	
PEOPLE FORMS AND SERVICE CENTERS)	
USA, INC., a California Corporation; and)	
WE THE PEOPLE USA, INC., a Delaware)	
Corporation,)	
)	
Defendants.)	

SECOND AMENDMENT TO COMPLAINT

The State of Tennessee hereby amends its Complaint in this case in the following particulars:

1. By adding the new Defendant to the caption of the Complaint: “We The People USA, Inc., a Delaware Corporation.”
2. By adding the following new paragraph to the “Defendants” section of the Complaint:

“4E. Defendant We The People USA, Inc. is a wholly-owned subsidiary of Dollar Financial Corporation. Defendant We The People USA, Inc. is a Delaware corporation that is also registered with the California Secretary of State and lists its address as 151 Market Street Suite 1210, Philadelphia, Pennsylvania 19102. Defendant We The People USA, Inc., is upon information and belief, the successor corporation carrying on the business of Defendant We The People Forms and Service Centers USA, Inc. and wholly owns and operates Defendant We The People of Nashville, TN, Inc. and Defendant We The People of Knoxville, TN, Inc.”

3. By adding the following new paragraphs to the “Factual Allegations” section of the Complaint:

“83E. Defendant We The People USA, Inc. engaged in conduct virtually identical to conduct alleged in paragraphs (5) - (83D) above, except that this Defendant may have not used a Supervisory Attorney as alleged above.”

“83F. Defendant We The People USA, Inc. has advertised on various television stations in the Nashville area and on their Internet website making the following statements: ‘Divorce. Lawyer’s fees: \$X vs We The People: \$X. You’ve both agreed not to take each other to the cleaners. So why let your lawyer?’; ‘Many uncontested legal matters such as bankruptcies, wills, incorporations - even divorces - can be resolved without a lawyer and without expensive legal fees;’ ‘Living Trust. Lawyer’s fees: \$X vs We The People: \$X. Sure, you can hire a lawyer to prepare your living trust. You’ll just have about \$X less to put in it;’ ‘Incorporation. Lawyer’s fees: \$X vs We The People: \$X. Now that you’re in business, it’s time to start paying closer attention to the bottom line;’ ‘It seems many lawyers have confused the Bill of Rights with the right to bill;’ and ‘It’s your right to represent yourself, so why pay expensive lawyer’s fees when you don’t have to?’

4. By adding the following new sections and paragraphs to Count I of the “Violations of the Law” section of the Complaint:

E. DEFENDANT WE THE PEOPLE USA, INC.

“105I. Plaintiff incorporates by reference and realleges each and every allegation contained in Paragraphs (5) - (83F) of this Complaint.”

“105J. Defendant We The People USA, Inc. has been and/or is engaging in “law business,” engaging in the “practice of law,” and performing legal services for persons within the State of Tennessee as defined in Tenn. Code Ann. § 23-3-101 *et seq.*”

“105K. By soliciting clients through advertisements and promotions which state that We The People can provide legal document services, Defendant We The People USA, Inc. has been and/or is engaging in “law business” and the “practice of law” pursuant to Tenn. Code Ann. §§ 23-3-101(1) and (2).”

“105L. By assisting or procuring in the drawing of legal documents for a valuable consideration, Defendant We The People USA, Inc. has been and/or is engaging in “law business” and the “practice of law” pursuant to Tenn. Code Ann. §§ 23-3-101(1) and (2).”

“105M. By advising or counseling consumers for a valuable consideration regarding secular laws, Defendant We The People USA, Inc. has been and/or are engaging in “law business” pursuant to Tenn. Code Ann. § 23-3-101(1).”

“105N. By acting in a representative capacity for a valuable consideration, Defendant We The People USA, Inc. has been and/or is engaging in “law business” and the “practice of law” pursuant to Tenn. Code Ann. § 23-3-101(1) and (2).”

“105O. By engaging in the “law business” and “practice of law” without having been duly

licensed, Defendant We The People USA, Inc. has been and/or is engaged in the unlawful practice of law, in violation of Tenn. Code Ann. § 23-3-103(a).”

“105P. By continuing to hold itself out as authorized to prepare and assist in the preparation of legal pleadings to be used in court proceedings, despite the fact that Defendant and its employees are not licensed to practice law in the State of Tennessee, Defendant We The People USA, Inc. continues to violate Tenn. Code Ann. § 23-3-103 by engaging in “law business” and the “practice of law” without a law license issued by the State of Tennessee.”

5. By adding the following new sections and paragraphs to Count II of the “Violations of the Law” section of the Complaint:

E. DEFENDANT WE THE PEOPLE USA, INC.

“141O. Plaintiff incorporates by reference and realleges each and every allegation contained in Paragraphs (5) - (83F) of this Complaint.

“141P. Defendant We The People USA, Inc.’s offering of legal services to consumers, as alleged herein, constitutes the offering of or providing of “goods” and/or “services” and constitutes “trade,” “commerce” and/or a “consumer transaction” as defined in Tenn. Code Ann. §§ 47-18-103 (5), (10) and (11).”

“141Q. All of the acts and practices engaged in and employed by Defendant We The People USA, Inc., as alleged herein, are “unfair or deceptive acts or practices affecting the conduct of any trade or commerce” in Tennessee, which are declared unlawful by Tenn. Code Ann. § 47-18-104(a).”

“141R. Defendant We The People USA, Inc. has caused likelihood of confusion or of misunderstanding as to the source and approval of its services, in violation of Tenn. Code Ann. §

47-18-104(b)(2).”

“141S. Defendant We The People USA, Inc. has caused likelihood of confusion or of misunderstanding as to the affiliation, connection or association with, or certification by, another, in violation of Tenn. Code Ann. § 47-18-104(b)(3).”

“141T. Defendant We The People USA, Inc. has misrepresented that its services have approval, characteristics, uses or benefits of legal expertise that Defendant does not have, in violation of Tenn. Code Ann. § 47-18-104(b)(5).”

“141U. Defendant We The People USA, Inc. has misrepresented that its services are of a particular standard, quality, or grade, in violation of Tenn. Code Ann. § 47-18-104(b)(7).”

“141V. Defendant We The People USA, Inc. has represented or implied that a consumer transaction confers or involves rights, remedies or obligations that it does not have or involve, in violation of Tenn. Code Ann. § 47-18-104(b)(12).”

“141W. Defendant We The People USA, Inc. has used statements or illustrations in advertisements which create a false impression of the quality, value, or origin of the goods or services offered, in violation of Tenn. Code Ann. § 47-18-104(b)(21).”

“141X. By accepting payment for legal services and failing to deliver as alleged in paragraphs (5) - (83F), Defendant We The People USA, Inc. has engaged in conduct in violation of Tenn. Code Ann. §§ 47-18-104(a) and (b)(27).”

“141Y. By failing to clearly and conspicuously disclose to consumers that Defendant has not met the State’s requirements to practice law and Defendant cannot legally offer legal services, including the preparation of legal documents without a valid law license or the assistance of an attorney as alleged in paragraphs (5) - (83F), Defendant We The People USA, Inc. has violated

Tenn. Code Ann. §§ 47-18-104(a) and (b)(27).”

“141Z. All of the acts and practices engaged in and employed by Defendant We The People USA, Inc., as alleged herein, are deceptive to consumers in violation of Tenn. Code Ann. § 47-18-104(b)(27).”

“141AA. By engaging in unfair conduct which subjected consumers to unfair risks of monetary loss and unfair risks of harm to their legal interests, Defendant We The People USA, Inc. violated Tenn. Code Ann. § 47-18-104(a).”

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document was served via U.S. Mail on the following individuals on the 8th day of July, 2005:

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